

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DONNA WOOD, CAELAN DOHERTY, MAX GOLDSTEIN, BRIDGET LOGAN, JAMES KYLE NEWMAN, ZIA ORAM, ALAN ROBINSON, ALEXANDRA MARIE WHEATLEY-DIAZ, individually and on behalf all others similarly situated, and CHERYL BALDWIN, JONATHAN BARRIO, DESMOND BATTS, GARRETT BECKENBAUGH, COCHIESE BOWERS, MILES CEPLECHA, ROBIN CEPPOS, MELINDA CIRILO, JANE CONRAD, ROBERT CORDOVA, JR., CHRISTINE DOCZY, RACHEL DOUGLAS, THERESA EDWARDS, ELIZA FINK, JASON FINKELSTEIN, ILSE MENDEZ FRAGA, JOSH FREDRICKSON, MARIA GONZALEZ, NATHANIEL ROBERT GROH, BRANDI HARRIS, PETER KAMARA, MACK KENNEDY, MADISON OLIVER MAYS, PATRICK MCHUGH, FRIDA MICHELLE NARANJO, PAUL MONTEROSSO, REY MURPHY, JOSEPH NESTOR, LUKE NICHOLAS, JOSEPHINE OLINGER, ALEC SILVESTER, DANIEL SMITH, CHRIS SOTH, AUDRA TELLEZ, CARLOS TORRES, ELLIOTT TRICOTTI, GLORIA TYLER, LAKISHA WATSON-MOORE, JESSE WEINBERG, CLEM WRIGHT, ANOOSH YARAGHCHIAN, and JESUS ZAMORA, individually,,

Plaintiffs,

v.

MIKE BLOOMBERG 2020, INC.,

Defendant.

No. 20 Civ. 2489 (LTS) (GWG)

**DECLARATION OF SALLY J. ABRAHAMSON IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CONDITIONAL CERTIFICATION OF A COLLECTIVE AND  
COURT-AUTHORIZED NOTICE PURSUANT TO 29 U.S.C. § 216(b)**

I, Sally J. Abrahamson, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner at the firm of Outten & Golden LLP (“O&G”) in Washington, D.C. I am admitted to practice before this Court. Along with lawyers from Shavitz Law Group, P.A., I am one of the lawyers primarily responsible for prosecuting Plaintiffs’ claims on behalf of the proposed collective.

2. I make this declaration in connection with Plaintiffs’ Motion for Conditional Certification of a Collective and Court-Authorized Notice Pursuant to 29 U.S.C. § 216(b).

3. I have personal knowledge of the matters set forth herein and would so testify if called as a witness at trial.

#### **Relevant Litigation History**

1. Including Plaintiff Donna Wood, 100 Field Organizers have joined this case as opt-in plaintiffs. *See* ECF No. 61.

2. Twenty-three Field Organizers from 15 states have submitted declarations of support with this motion. *See* Exs. 1-23.

3. No formal discovery has yet taken place.

#### **Exhibits**

4. Attached as **Exhibit 1** is a true and correct copy of the Declaration of Donna Wood (“Wood Decl.”), dated March 31, 2020.

5. Attached as **Exhibit 2** is a true and correct copy of the Declaration of Cochiese Bowers (Bowers Decl.”), dated March 31, 2020.

6. Attached as **Exhibit 3** is a true and correct copy of the Declaration of Matthew Kelly (“Kelly Decl.”), dated March 31, 2020.

7. Attached as **Exhibit 4** is a true and correct copy of the Declaration of James Kyle Newman (“Newman Decl.”), dated March 30, 2020.

8. Attached as **Exhibit 5** is a true and correct copy of the Declaration of McKevin King (“King Decl.”), dated March 31, 2020.

9. Attached as **Exhibit 6** is a true and correct copy of the Declaration of Elliott Tricotti (“Tricotti Decl.”), dated March 30, 2020.

10. Attached as **Exhibit 7** is a true and correct copy of the Declaration of Zia Oram (“Oram Decl.”), dated March 31, 2020.

11. Attached as **Exhibit 8** is a true and correct copy of the Declaration of Josephine Olinger (“Olinger Decl.”), dated March 30, 2020.

12. Attached as **Exhibit 9** is a true and correct copy of the Declaration of Audra Waylett (“Waylett Decl.”), dated March 30, 2020.

13. Attached as **Exhibit 10** is a true and correct copy of the Declaration of Frida Michelle Naranjo (“Naranjo Decl.”), dated March 30, 2020.

14. Attached as **Exhibit 11** is a true and correct copy of the Declaration of Max Federman (“Federman Decl.”), dated March 30, 2020.

15. Attached as **Exhibit 12** is a true and correct copy of the Declaration of Justin Odhiambo (“Odhiambo Decl.”), dated March 31, 2020.

16. Attached as **Exhibit 13** is a true and correct copy of the Declaration of Bridget Logan (“Logan Decl.”), dated March 30, 2020.

17. Attached as **Exhibit 14** is a true and correct copy of the Declaration of Marcus Guthrie (“Guthrie Decl.”), dated March 30, 2020.

18. Attached as **Exhibit 15** is a true and correct copy of the Declaration of Rey

Murphy (“Murphy Decl.”), dated March 31, 2020.

19. Attached as **Exhibit 16** is a true and correct copy of the Declaration of Alan Robinson (“Robinson Decl.”), dated March 30, 2020.

20. Attached as **Exhibit 17** is a true and correct copy of the Declaration of Audra Tellez (“Tellez Decl.”), dated March 30, 2020.

21. Attached as **Exhibit 18** is a true and correct copy of the Declaration of Caelan Doherty (“Doherty Decl.”), dated March 31, 2020.

22. Attached as **Exhibit 19** is a true and correct copy of the Declaration of Robin Ceppos (“Ceppos Decl.”), dated March 31, 2020.

23. Attached as **Exhibit 20** is a true and correct copy of the Declaration of Cooper Lewis (“Lewis Decl.”), dated March 31, 2020.

24. Attached as **Exhibit 21** is a true and correct copy of the Declaration of Eliza Fink (“Fink Decl.”), dated March 31, 2020.

25. Attached as **Exhibit 22** is a true and correct copy of the Declaration of Lakisha Watson-Moore (“Watson-Moore Decl.”), dated March 31, 2020.

26. Attached as **Exhibit 23** is a true and correct copy of the Declaration of Luke Nicholas (“Nicholas Decl.”), dated March 31, 2020.

27. Attached as **Exhibit 24** is a true and correct copy of a Bloomberg Campaign Field Organizer job posting.

28. Attached as **Exhibit 25** is a true and correct copy of a Bloomberg Campaign Regional Organizing Director job posting.

29. Attached as **Exhibit 26** is Plaintiffs’ Proposed Notice and Consent to Join Form.

30. Attached as **Exhibit 27** is Plaintiffs’ Proposed Reminder Notice.

\* \* \*

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Dated: April 17, 2020  
New York, NY

/s/ Sally J. Abrahamson

Sally J. Abrahamson  
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**CERTIFICATION OF SERVICE**

I hereby certify that on April 17, 2020, the above document was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system and by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

By: /s/ Sally J. Abrahamson  
Sally J. Abrahamson